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September 12, 1986

FEDERAL EXPRESS

Ms. Susan E. Belski (3HW16)
Compliance Officer
United States Environmental
Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

SEP 15 1986

Re: Limestone Road Site
Cumberland, Maryland
3HW16

Cumberland Cement
and Supply Company

Dear Ms. Belski:

I write on behalf of Cumberland Cement and Supply Company ("Cumberland Cement") in response to a letter dated August 11, 1986 from Steven R. Wassersug. Mr. Wassersug's letter accompanied the draft RI/FS respecting the above-mentioned site and indicated that EPA was interested in comments regarding the RI/FS. Your office has requested such comments be forwarded no later than the date of this letter.

As a prefatory matter, Cumberland Cement adopts the discussion contained in the "General Commentary" section of the letter dated September 10, 1986 to you from Richard R. Molleur, Esquire, counsel for Fairchild Industries, Inc. Cumberland Cement, of course, reserves the right to supplement those comments as future discussions and analysis may warrant.

As a further comment, Cumberland Cement has strong reservations about the validity of the cost estimates for certain major components of the assembled alternatives in the FS. The estimates prepared by EPA's contractor are grossly understated. At Cumberland Cement's request, a request for proposal was issued to an interstate engineering and construction firm with op

AR301511

Ms. Susan E. Belski
September 12, 1986
Page Two

in Western Maryland prepared estimates for projects listed in Tables 5-3 (soil alternatives evaluation matrix) and 5-4 (groundwater alternatives evaluation matrix) of the FS. The Western Maryland firm, which has extensive experience in undertaking such projects in the region where the site is located, determined that the actual costs of the proposed alternatives far exceed the estimates set forth in the FS.

For example, the Western Maryland firm estimated that the cost of a clay cap -- not including topsoil -- for the Cumberland Cement parcel of the site would be \$655,000.00. However, the FS estimate lists the capital cost for that same portion of the site at only \$181,500.00. (FS, Table 5-3). Further, EPA's contractor estimated that the capital cost of providing an alternate water supply, by means of extending the City of Cumberland water distribution system to the Limestone Road residents, to be only \$176,800.00. (FS, Table 5-4). The Western Maryland firm, however, estimates that the same work will cost between \$450,000.00 and \$500,000.00. Finally, the construction of a surface water interception and diversion trench -- a remedial alternative that EPA has made clear it does not intend to pursue -- is estimated by the Western Maryland contractor to have a total cost of \$700,000.00; the FS estimated the capital cost of that diversion system, a major undertaking, to be only \$390,000.00.

For obvious reasons, the validity of the cost estimates prepared by EPA's contractor is clearly suspect. The astonishing discrepancy between the two sets of estimates compels the conclusion that further detailed and independent analysis of the assembled alternatives must occur before Cumberland Cement can fairly be expected to participate in any voluntary plan for remedial action.

I also write to advise you that Cumberland Cement concurs in the discussion entitled "Proposed Remedial Action" in Mr. Molleur's letter of September 10, 1986 to you. Cumberland Cement believes that, as generally outlined, the proposed action will be an adequate response to the environmental circumstances at the site. As discussed in my August 26, 1986 letter to you, all the interested parties, and the various governmental units, will need to address allocation of costs and responsibilities for the preparation of the RI/FS and the execution of any remedial action consistent with the purpose and thrust of CERCLA, re
action must be cost effective and Cumberland Cement. -

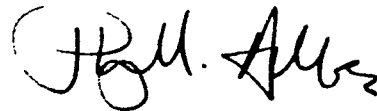
AR301512

Ms. Susan E. Belski
September 12, 1986
Page Three

participation in any such plan is inexorably bound, of course, to its financial ability to so participate.

I look forward to discussing these comments with you in the near future, in the hope that an appropriate conclusion can be reached soon respecting remedial action at the Site.

Sincerely,

A handwritten signature in dark ink, appearing to read "P.M. Andrews", written in a cursive style.

Philip M. Andrews

PMA:jac
cc: Mr. Charles S. Steiner
W. Stevens Hidey, Esquire

AR30.15.13